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CLEARINGHOUSE RULE 99-098

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

2. Form, Style and Placement in Administrative Code

a. It is suggested that the second and third sentences of the department’s analysis be combined to read as follows: “Therefore, ch. Med 6 and ss. Med 10.02 (2) (v) and (y), 13.03 (1) (c) and 13.05 (1m) are repealed because they relate solely to podiatrists.”

It would be helpful if the department’s analysis indicated the status of the rules that are intended to replace the repealed and amended rules.

b. It is not clear why reference to “podiatrists” is being removed from s. Med 19.08 (2) (a). Removal of the term from that provision does not appear to be required by 1997 Wisconsin Act 175.

4. Adequacy of References to Related Statutes, Rules and Forms

Three of the references to the affected rules in the department’s analysis are incorrect. Two of those references are corrected in the rewrite of the second and third sentences suggested above. In the last sentence of the analysis, reference should be to s. Med 10.02 (2) (za).